

Compass Communications of Idaho, Inc. is the licensee of KFXP (TV) in Pocatello/Idaho Falls, Idaho. KFXP (TV) is a Fox network affiliate. I, Gerald R. Proctor, am the President of and sole shareholder in Compass Communications. Comments in this proceeding are filed on behalf of the Company and also represent my personal beliefs.

For sixty-two years, I have been closely associated with broadcasting in every conceivable manner. This experience encompasses a broad cross-section of the industry and includes actual construction of new broadcast facilities from concept to on-air operation and runs the gamut from radio (both AM and FM) to television and even FM and TV translators. You cannot name a job in small market radio or television that I have not done and that means from being the janitor on up.

I've spent most of the last two days going over your REPORT ON BROADCAST LOCALISM AND NOTICE OF PROPOSED RULEMAKING. The over-riding thought that comes to mind is the old saying: "Be careful of that for which you wish because your wish may be granted." Broadcasting has its faults. It always has and always will but a return to the failed policies of the last century is not the answer! It appears to me the Commission is trying to make each individual station become all things to all people under all circumstances. Thirty or forty years ago broadcast stations did try to serve as many different segments of their audience as possible because there were far fewer stations and many less opportunities for various entities to be seen or heard. Now, with the explosion in the number of broadcast outlets, you can tune across the dial and see or hear every conceivable "message" or form of entertainment you choose. And, chances are, you will find the exact message, news, informatio

n or entertainment desired. To turn back the clock and insist that each station conform to a rigid set of guidelines will decrease the access of the people..not increase it.

After careful reading of the REPORT and its summaries, it appears to me the bulk of the complaints center around not "denied access" but the fact that the amount of time devoted to that access is considered insufficient by the requesting entity. In my sixty-two years in this industry, I have NEVER had a complaint from any group, organization, politician, individual or other entity - real or imagined - that has complained to me about being denied access to any broadcast outlet I may have owned or managed. And, quite frankly and in my personal opinion, this has included some certifiable "nut cases"! What I have experienced is dissatisfaction with the amount of air time allowed. In many instances, even if you turned over the whole broadcast day to the complaining entity, it still would not please them and they would want to know why they couldn't have two days or three. I have always believed it should be the obligation of the licensee to be as fair and impartial as possible, knowing full well, this is not going to please some individuals or groups.

In its comments, Belo Corporation mentions "one-size-fits-all governmental oversight". It appears to me that is exactly what the Commission is attempting to do. With two exceptions, I've never worked in or been the licensee of a station in a major market. The dominant portion of my "broadcast life"

has been in small and medium sized markets. It is inconceivable to me that any broadcaster can operate in a small or medium sized market and not intimately know the needs of their community without ascertainment surveys and community advisory boards. Isn't that why broadcasters belong to or serve on Chambers of Commerce, School Boards, City and County governments, churches and all manner of other civic and public service organizations? To revert to last century regulation is to step back into the dark ages.

The Commission seems very concerned about "Underserved Audiences" Where? Right now you can tune across the dial of your radio and television sets and listen to or see virtually every type of programming known to man extending politically from the extreme far left to the extreme far right. News and all other types of information is repeated ad nauseum. Music of every genre is instantly available. Every imaginable religious organization or church may be heard. Where is the underserved audience? Oh, I know, you're talking about the person who calls fourteen times each day wanting you to play their favorite song! Now that is an underserved audience but, in so far as I'm concerned, that's why they manufacture and sell compact disks.

For small and medium markets, each time the Commission ratchets up the regulatory burden, it leaves less time and resources to do the job we set out to do at the outset..and that's to serve our communities. When you establish a rigid set of reporting guidelines that must be followed, you stifle growth, originality and promote a uniformity that is totally unwarranted and totally counter productive and this is especially true if you consider the huge number of new radio and television stations that have been licensed in the last 30 years. Instead of reverting to last century policies that failed then and will fail now, why not step into the twenty-first century and look forward.not backward.

Finally, are there bad apples in the barrel? Certainly. And, unfortunately, there always will be. How do you deal with these bad apples? Fines don't really work. Many of the large broadcasters believe this to be only a "cost of doing business". In fact I've heard it said the Commission is not interested in regulation; only in the ability regulation provides them to issue fines. True or not, what does work, and will offer the greatest deterrent to Commission rule violations, is license revocation. Revoke a few licenses and see how much straighter most licensees will fly! You can probably find several candidates before dark.if you look!

Gerald R. Proctor, President

Compass Communications of Idaho, Inc.